

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: Karthikeya Allada

Debtor,

Nationstar Mortgage LLC d/b/a Mr. Cooper
Movant.

v.

Karthikeya Allada
Debtor/Respondent,

Ronda J. Winnecour, Trustee
Additional Respondent.

BANKRUPTCY CASE NUMBER
18-24381-GLT

CHAPTER 13

**RESPONSE OF NATIONSTAR MORTGAGE LLC D/B/A MR. COOPER TO
DEBTOR'S MOTION TO SELL REAL PROPERTY FREE AND CLEAR OF ALL
MORTGAGES, LIENS AND ENCUMBRANCES**

Nationstar Mortgage LLC d/b/a Mr. Cooper, by and through its counsel, LOGS Legal Group LLP, hereby responds to Debtor's Motion to Sell Real Property Free and Clear of All Mortgages, Liens and Encumbrances, and in support thereof, avers as follows:

1. Admitted based upon information and belief.
2. Admitted based upon information and belief.
3. Denied. The averments of this paragraph are denied as a legal conclusion to which no response is required.
4. Admitted, by way of further response Respondent requested a payoff figure good through May 23, 2022, which lists \$172,463.50 as an updated payoff figure.
5. Admitted
6. Denied. The averments of this paragraph are denied because Respondent does not have enough information to
7. Admitted based upon information and belief.
8. Admitted based upon information and belief.
9. Admitted based upon information and belief.
10. Admitted based upon information and belief.

11. Admitted based upon information and belief.
12. Admitted based upon information and belief.
13. Admitted based upon information and belief.
14. Denied. The averments of this paragraph are denied as Respondent does not have adequate information available to confirm their accuracy.
15. Denied. The averments of this paragraph refer to a writing which speaks for itself. Any mischaracterizations thereof are strictly denied.
16. Denied. The averments of this paragraph are denied as Respondent does not have adequate information available to confirm their accuracy.
17. Denied. The averments of this paragraph are denied as Respondent does not have adequate information available to confirm their accuracy.
18. Denied. The averments of this paragraph are denied as Respondent does not have adequate information available to confirm their accuracy.
19. Admitted, by way of further response, Respondent does not object to the sale of the property so long as Respondent is paid in full pursuant to a valid payoff figure.
20. Admitted, by way of further response, Respondent does not object to the sale of the property so long as Respondent is paid in full pursuant to a valid payoff figure and Debtor shall seek the permission of Nationstar Mortgage LLC d/b/a Mr. Cooper for any short sale.

WHEREFORE, Nationstar Mortgage LLC d/b/a Mr. Cooper respectfully requests that confirmation of the Debtor's Motion to Sell Real Property Free and Clear of All Mortgages, Liens and Encumbrances be granted so long as Nationstar Mortgage LLC d/b/a Mr. Cooper is paid in full pursuant to a valid payoff figure.

/s/ Lily C. Calkins

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CERTIFICATE OF SERVICE

I, Lily C. Calkins, an employee of the law firm of LOGS Legal Group LLP hereby certify that I caused to be served true and correct copies of the foregoing by First Class Mail, postage prepaid, at the respective last known address of each person set forth below on this 5th day of May, 2022:

Karthikeya Allada
658 Vance Drive
Lower Burrell, PA 15068

Bryan P. Keenan, Esquire
993 Greentree Road
Suite 101
Pittsburgh, PA 15220
keenan662@gmail.com - VIA ECF

Ronda J. Winnecour, Trustee
Suite 3250, USX Tower
600 Grant Street
Pittsburgh, PA 15219
cmeccf@chapter13trusteewdpa.com - VIA ECF

I HEREBY CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

/s/ Lily C. Calkins

Christopher A. DeNardo 78447

Kristen D. Little 79992

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ORDER

AND NOW, this _____ day of _____, 2022, upon consideration of the Motion to Sell Real Property Free and Clear of All Mortgages, Liens and Encumbrances and Respondent's response thereto;

It is hereby ORDERED that Motion to Sell Real Property Free and Clear of All Mortgages, Liens and Encumbrances are GRANTED so long as Nationstar Mortgage LLC d/b/a Mr. Cooper is paid in full pursuant to a proper payoff figure.

BY THE COURT:

HONORABLE GREGORY L. TADDONIO
UNITED STATES BANKRUPTCY JUDGE